



**HELEN F. DALTON & ASSOCIATES, P.C.**  
**ATTORNEYS AT LAW**

---

80-02 Kew Gardens Road, Suite 601, Kew Gardens, New York 11415  
Tel. (718) 263-9591 Fax. (718) 263-9598

June 21, 2021

**Via ECF**

The Honorable Judge Lois Bloom  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: **Maldonado et al v. Parmagianni Enterprises LLC et al**  
**19-cv-3150 (ARR)(LB)**

Dear Judge Bloom:

Our office represents the Plaintiffs in the above-referenced matter and submit this status report jointly with the Defendants pursuant to the Court's May 27, 2021 Order.

The parties appeared for a telephonic status conference on May 27, 2021, during which the parties discussed with the Court the possibility of revisiting settlement negotiations through the mediation program. The parties held subsequent discussions regarding possible resolution following the conference, however during those discussions it became clear that the parties would not be able to resolve this matter through mediation.

As the parties are unable to resolve the matter at this time, we respectfully request that the Court set a date for the filing of the joint pre-trial order and other required pre-trial submissions. The parties respectfully request 30 days to file their pre-trial documents. If this request is granted, the parties can file on or before July 19, 2021.

We thank the Court for its attention to this matter and remain available to provide any additional information.

Respectfully submitted,

*James O'Donnell*  
James O'Donnell, Esq.